SSUNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

AMERICAN BROADCASTING COMPANIES, INC., DISNEY ENTERPRISES, INC., TWENTIETH CENTURY FOX FILM CORPORATION. CBS BROADCASTING INC., CBS STUDIOS INC., FOX TELEVISION STATIONS, LLC, FOX BROADCASTING COMPANY, LLC, NBCUNIVERSAL MEDIA, LLC, UNIVERSAL TELEVISION LLC, and OPEN 4 BUSINESS PRODUCTIONS, LLC,

Plaintiffs,

V.

DAVID R. GOODFRIEND and SPORTS FANS COALITION NY, INC.,

Defendants.

No. 19-cv-7136 (US)

SDC SDNY	I	
OCUMENT	-	
DOC #:		

SECOND JOINT STIPULATION AND IPPOPOSED ORDER MODIFYING CASE SCHEDULING ORDER

Plaintiffs, American Broadcasting Companies, Inc., Disney Enterprises, Inc., Twentieth Century Fox Film Corporation, CBS Broadcasting Inc., CBS Studios Inc., Fox Television Stations, LLC, Fox Broadcasting Company, LLC, NBCUniversal Media, LLC, Universal Television LLC, and Open 4 Business Productions, LLC ("Plaintiffs"), and Defendants, David R. Goodfriend and Sports Fans Coalition NY, Inc. ("Defendants"), by and through their counsel, respectfully submit this Second Joint Stipulation and Proposed Order Modifying the Scheduling Order in the above-captioned matter.

On January 31, 2020, this Court entered an initial Scheduling Order with deadlines set through the close of expert discovery on September 11, 2020. The Court also scheduled a status conference for June 19, 2020 to assess the progress of the case and set the remaining case

schedule. At the parties' joint request, this Court on May 12, 2020 entered an Order modifying the case schedule by extending the existing deadlines by eight weeks.

The parties now request a second eight-week extension of the deadlines set forth below (and nine weeks in one instance in light of the Christmas/New Year holiday) because of the continuing impact of the disruptions caused by the COVID-19 health crisis, including local government restrictions on out-of-home business activities. Counsel for the parties have conferred about the effect of these circumstances upon the case's schedule. This is the second time the parties have sought an extension or modification to the case schedule.

IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval, that the following deadlines are extended pursuant to the table below:

Event	Current Deadline	New Deadline
Status conference	Friday, June 19 (removed from calendar)	Friday, October 9
Fact discovery completed	Friday, August 14	Friday, October 9
Burden-of-proof expert reports	Friday, September 11	Friday, November 6
Rebuttal expert reports	Friday, October 9	Friday, December 4
Expert discovery completed	Friday, November 6	Friday, January 8

Dated: July 6, 2020

Respectfully submitted,

/s/ Elizabeth E. Brenckman

R. David Hosp Elizabeth E. Brenckman

ORRICK, HERRINGTON & SUTCLIFFE LLP

51 West 52nd Street
New York, NY 10019
Tel: (617) 880-1886
(212) 506-3535
dhosp@orrick.com
ebrenckman@orrick.com

Mark S. Puzella (pro hac vice) Sheryl Koval Garko (pro hac vice) 222 Berkeley Street, Suite 2000 Boston, MA 02116 Tel: (617) 880-1896

(617) 880-1919 mpuzella@orrick.com sgarko@orrick.com

Mitchell L. Stoltz Electronic Frontier Foundation 815 Eddy Street San Francisco, CA 94109 Tel: (415) 436-9333 mitch@eff.org

Attorneys for Defendants David R. Goodfriend and Sports Fans Coalition NY, Inc.

On this day of July, 2020,

Approved By:

The Honorable Louis L. Stanton United States District Judge

/s/ Thomas G. Hentoff
Gerson A. Zweifach
Thomas G. Hentoff (pro hac vice)
Joseph M. Terry (pro hac vice)
WILLIAMS & CONNOLLY LLP
725 Twelfth Street, N.W.
Washington, DC. 20005

650 Fifth Avenue Suite 1500 New York, NY 10019

Tel: (202) 434-5000 gzweifach@wc.com thentoff@wc.com jterry@wc.com

Attorneys for All Plaintiffs/Counterclaim Defendants

Paul D. Clement (pro hac vice) Erin E. Murphy (pro hac vice) KIRKLAND & ELLIS LLP 1301 Pennsylvania Avenue, NW Washington, DC 20004

Tel: (202) 389-5000 paul.clement@kirkland.com erin.murphy@kirkland.com

Attorneys for Plaintiffs Fox Television Stations, LLC and Fox Broadcasting Company, LLC